

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)	
PENSION PLAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 14 C 6588
)	
SECURITY FENCE CO., INC.,)	JUDGE JAMES B. ZAGEL
a dissolved Illinois corporation, and)	
)	
JEFFREY H. COLE, d/b/a SECURITY)	
FENCE CO., INC.,)	
)	
Defendants.)	

MOTION FOR ENTRY OF JUDGMENT

Plaintiffs, by and through their attorneys, default having been entered against the Defendants on November 20, 2014, request this Court enter judgment against Defendants, SECURITY FENCE CO., INC., a dissolved Illinois corporation, and JEFFREY H. COLE, d/b/a SECURITY FENCE CO., INC. In support of that Motion, Plaintiffs state:

1. On November 20, 2014, Judge Holderman entered default against Defendants and granted Plaintiffs' request for an order directing an audit of the Defendant, Security Fence Co., Inc.'s payroll books and records for the time period March 1, 2013 forward. Judge Holderman's order also provided that judgment would be entered after the completion of the audit.

2. On or about June 1, 2015, Plaintiffs' auditors completed the audit. After considering disputes of the findings raised by Defendant, the audit show that the Defendant is delinquent in the

submission of contributions to the Funds in the amount of \$2,237.15, plus liquidated damages of \$702.37 and audit costs of \$1,42.38 (See Affidavit of Joseph J. Burke, Par. 5, 6).

3. Additionally, the amount of \$75,115.96 is due for contributions for March 2014 through June 2015 based on payroll records and check stubs submitted by the Defendant and its employees (Burke Aff. Par. 7).

5. The amount of \$9,866.48 is due for liquidated damages through June 2015 (Burke Aff. Par. 8).

6. Finally, Plaintiffs' firm has expended the total amount of \$616.00 in costs and \$4,539.50 in attorneys' fees, for a total of \$5,155.50, in this matter. (See Affidavit of Catherine M. Chapman).

7. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$94,539.84.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$94,539.84.

/s/ Patrick N. Ryan

Patrick N. Ryan
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 1st day of September 2015:

Mr. Jeffrey H. Cole, Registered Agent
Security Fence Co., Inc.
2022 S. Griswold
Peoria, IL 61605

Mr. Jeffrey H. Cole,
d/b/a Security Fence Co., Inc.
2022 S. Griswold
Peoria, IL 61605

/s/ Patrick N. Ryan _____

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